

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Northern District of New York

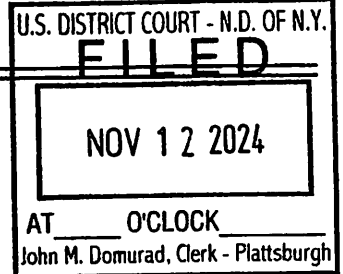
UNITED STATES OF AMERICA

v.

Robert LAROCK, Tamee ROOD, and
Brent PELKEY

Defendants.

Case No. 8:24-MJ-526 (GLF)



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.
Between on or about November 7, 2024, through on or about November 10, 2024, in the county of St. Lawrence
in the Northern District of New York, the defendants violated:

<i>Code Section</i>	<i>Offense Description</i>
8 U.S.C. § 1324(a)(1)(A)(v)(I)	Conspiracy to Bring Aliens

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Complainant's signature

U.S. Border Patrol Agent Benjamin LaBaff

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: November 12, 2024

Judge's signature

City and State: Plattsburgh, New York

Hon. Gary L. Favro, U.S. Magistrate Judge

Printed name and title

Continuation Sheet, *United States v. Robert Larock, Tamee Rood, and Brent Pelkey*

This criminal complaint is based on these facts:

On Thursday, November 7, 2024, Border Patrol Agents (BPA) from the Massena Border Patrol Station were operating within the Massena Border Patrol's area of responsibility, specifically, Louisville, New York. Over the past month, BPA have noted a large increase of human smuggling exploiting various boat launches in Louisville, New York and Massena, New York.

Massena Border Patrol Agents had received information that human smugglers were going to use the Wilson Hill Boat Launch to move aliens. The information included that the smugglers had procured a predominantly white 1990s model Sunray boat. This matched information provided to Massena Border Patrol Agents from a concerned citizen earlier in the day, stating that a Sunray boat was tied off at the Wilson Hill Boat Launch with no persons around it and no docks in the water.

On November 7, at approximately 4:00 p.m., BPA began looking for the boat in question. At approximately 5:00 p.m., BPA observed a dark in color Ford Bronco towing the boat in question, followed by a maroon Chevrolet Impala and a maroon Jeep Patriot. All three vehicles went to the Wilson Hill Boat Launch and launched the boat in question. One male and one female subject were observed leaving the launch in the boat and traveling north into international waters. Approximately one hour later, a 9-1-1 distress call was placed by an individual identified as Tamee ROOD, stating that her boat was broken down and she was stranded in the St. Lawrence River. The Massena Rescue dive team located the boat, along with two persons, one being ROOD and the other identified as Robert LAROCK, and towed them to safety at the Barnhart Island Boat Launch.

On November 8, 2024, at approximately 4:00 p.m., BPA went to the Barnhart Island Boat Launch and observed LAROCK and ROOD working on the propeller of the boat in question. Furthermore, BPA observed a maroon in color Jeep Patriot bearing New York license plates KFD 9255. ROOD stated that the vehicle belonged to her and her common law husband, LAROCK. Approximately two hours later, ROOD again contacted 9-1-1 dispatch, stating she was in distress again in the St. Lawrence River with LAROCK. Both subjects, along with the same boat, were again towed to shore at Barnhart Island. BPA overheard ROOD and LAROCK talking with New York State Police, stating they were done with that boat, or words to that effect.

On Saturday, November 9, 2024, an individual later identified as Brent PELKEY was observed gassing up a boat at the Wilson Hill Boat Launch. The boat launched and headed north towards international waters. Border Patrol surveillance near Wilson Hill later observed a group of approximately fourteen (14) subjects emerge from the boat launch and run to multiple vehicles, including a maroon Jeep and a maroon Toyota Prius. Although the individuals were gone by the time BPA responded, BPA were able to observe a new boat, a black-over-white Sunray vessel bearing number 21E16121, along with numerous life vests laying on the boat ramp. Taken together with the surveillance, this was indicative of alien smuggling and people running to a getaway vehicle quickly.

On Sunday, November 10, 2024, BPA conducted surveillance of the Wilson Hill Boat Launch and saw that the Sunray boat used on the previous day was still tied off, leading them to believe it would be utilized again on this date for a human smuggling event. At approximately 2:49 p.m., BPA observed a maroon Jeep pull up to the boat launch. A short time later, three subjects (two males and one female) emerged from the vehicle and walked towards the boat in question. At approximately 3:30 p.m., Massena Border Patrol Agents were able to confirm through electronic surveillance that the Sunray boat was no longer tied off at the launch. Furthermore, one subject, later identified as PELKEY, filled the boat with gas prior to the boat's departure from the Wilson Hill Boat Launch. The boat then traveled northbound towards international waters. PELKEY then entered the maroon Jeep immediately after gassing up and exiting the boat. PELKEY remained within the Jeep after the

Continuation Sheet, *United States v. Robert Larock, Tamee Rood, and Brent Pelkey*

boat left. Border Patrol Agents were able to confirm that the Jeep parked at the launch was the same Jeep known to be operated by ROOD and LAROCK.

At approximately 3:55 p.m. on November 10, BPA observed the boat in question traveling southbound towards the launch. A few minutes later, with the boat not making it back to the launch despite ample time to do so, BPA observed the boat near the southeastern corner of Wilson Hill Island in the Northern District of New York. It appeared the boat was either broken down or stuck. Then multiple subjects were observed leaving the boat and wading through frigid waters onto Wilson Hill Island along the sandbar.

At approximately 4:10 p.m., a Massena Border Patrol Agent apprehended a group of nine individuals in the dense vegetation on Wilson Hill Island, a few hundred yards west of where the boat was stranded. When questioned as to their citizenship and nationality status, the aliens stated they were citizens of the United Kingdom and had no legal documentation allowing them to be in, enter, or remain in the United States. When they were apprehended, the aliens were observed to have wet clothing, as though they had just swum or waded through the water. The aliens stated that they were picked up on the Canadian shoreline by one male and one female boat driver and brought across the river to the point where the boat was stranded. They were then made to leave the boat and walk or wade through water to shore, prior to being apprehended.

Simultaneously, another BPA encountered ROOD and LAROCK walking westbound a few hundred yards south of where the nine United Kingdom citizens were arrested. BPA detained ROOD and LAROCK. At the same time, a separate BPA approached the maroon Jeep and detained PELKEY, who was wearing the same clothing he was observed by surveillance to be wearing during the event on November 9, 2024. All twelve subjects, the maroon Jeep, and the Sunray boat were transported to the Massena Border Patrol Station for processing. At the station, records checks confirmed that the nine aliens were in the United States illegally, and that they had no immigration documents or status allowing them to be legally present in the United States.